



**Center for Clinical Standards and Quality/Survey & Certification Group**

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**Ref: S&C: 14-03-NH/LSC**

**DATE:** October 25, 2013

**TO:** State Survey Agency Directors

**FROM:** Director  
Survey and Certification Group

**SUBJECT:** Citations at F Tag 454 – 42 CFR §483.70 Physical Environment, §483.70(a) Life Safety from Fire

**Memorandum Summary**

- **Citations at F Tag 454 no longer apply:** The regulations at §483.70(a) are covered by the Life Safety Code (LSC) requirements and all citations under these regulations should be made under the appropriate LSC K Tags.
- **Systems Changes:** The Centers for Medicare & Medicaid Services (CMS), has deleted F Tag 454 from our Automated Survey Processing Environment (ASPEN) system.

**Background:**

It has come to our attention that F Tag 454 is cited primarily as a cross reference to LSC K Tag deficiencies. In addition, CMS staff conducted a review of other findings cited at F Tag 454 and determined that these findings would have been more appropriately cited under other F Tags or K Tags. Therefore, to avoid unnecessary duplication and redundancy and to provide for accurate deficiency citations, CMS has determined that the regulations at 42 CFR §483.70(a) are more appropriately cited under the LSC requirements and F Tag 454 has been deleted from the ASPEN system.

**Citations at F454 – §483.70 Physical Environment, §483.70(a) Life Safety From Fire:**

Any deficiency identified under these regulations should be cited under the corresponding LSC K Tag or other F Tag requirements as appropriate. A facility must meet the appropriate edition and chapter(s) of the Life Safety Code.

The LSC survey for safety from fire and/or other LSC requirements may be conducted directly by a State Survey Agency, contractor or a designated State fire authority. If the State Survey Agency has designated a fire authority to conduct the LSC survey on their behalf, the State must establish a process and procedures for their contracted State fire authority to notify them whether the facility is or is not in compliance with the LSC requirements.

If the Health survey team observes fire hazards or other possible deficiencies in LSC, they must notify the designated LSC State Surveyors or other State survey authority and refer these concerns as necessary. When appropriate the LSC surveyors or other State survey authority should follow up and would cite the corresponding K Tag as applicable.

For questions on this memorandum, please contact James Merrill at 410-786-6998 or via email at [James.Merrill@cms.hhs.gov](mailto:James.Merrill@cms.hhs.gov).

**Effective Date:** The guidance is effective immediately. Please ensure that all appropriate staff is fully informed within 30 days of the date of the memorandum.

**Training:** The information contained in this announcement should be shared with all survey and certification staff, their managers, and State and Regional Office training coordinators.

/s/

Thomas E. Hamilton

Attachment

cc: Survey and Certification Regional Office Management